

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ILLINOIS NATIONAL INSURANCE COMPANY, THE  
INSURANCE COMPANY OF THE STATE OF  
PENNSYLVANIA, and NATIONAL UNION FIRE  
INSURANCE COMPANY OF PITTSBURGH, PA,

Case No.: 11-CV-00431 (KBF)

**NOTICE OF MOTION FOR  
ADMISSION PRO HAC VICE**

Plaintiffs,

- against -

TUTOR PERINI CORPORATION,

Defendant.

-----X  
TUTOR PERINI CORPORATION,

Third Party Plaintiff,

- against -

CERTAIN UNDERWRITERS AT LLOYD'S LONDON

Third Party Defendant.

-----X  
PLEASE TAKE NOTICE that upon the annexed affirmations of Jenson Varghese and George C. Rockas in support of this motion, the undersigned will move this Court at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York for an order allowing the admission of George Rockas, a partner at Wilson, Elser, Moskowitz, Edelman & Dicker LLP and a member in good standing of the Bar of Massachusetts as attorney *pro hac vice* to argue or try this case in whole or in part as counsel to Third Party Defendant Certain Underwriters at Lloyd's London.

There are no pending disciplinary proceedings against George C. Rockas in any State or Federal court.

Dated: White Plains, New York  
February 24, 2012

Yours, etc.

**WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP**

By: \_\_\_\_\_

Jenson Varghese  
*Attorneys for Third Party Defendant  
Certain Underwriters at Lloyd's  
London*  
3 Gannett Drive  
White Plains, N.Y. 10601  
914-872-7720  
File No. 02099.00341

To: Finley T. Harckham, Esq.  
Vianny M. Pichardo, Esq.  
Anderson Kill & Olick, P.C.  
*Counsel for Defendant/Third Party Plaintiff  
Tutor Perini Corporation*  
1251 Avenue of the Americas  
New York, N.Y. 10020

John D. Hughes, Esq.  
Joshua W. Gardner, Esq.  
Edwards Wildman Palmer LLP  
*Counsel for Plaintiffs*  
111 Huntington Avenue  
Boston, M.A. 02199

## EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ILLINOIS NATIONAL INSURANCE COMPANY, THE  
INSURANCE COMPANY OF THE STATE OF  
PENNSYLVANIA, and NATIONAL UNION FIRE  
INSURANCE COMPANY OF PITTSBURGH, PA,

Plaintiffs,

Case No.: 11-CV-00431 (KBF)

**AFFIRMATION IN SUPPORT  
OF PRO HAC VICE  
ADMISSION**

- against -

TUTOR PERINI CORPORATION,

Defendant.

-----X  
TUTOR PERINI CORPORATION,

Third Party Plaintiff,

- against -

CERTAIN UNDERWRITERS AT LLOYD'S LONDON

Third Party Defendant.

-----X  
JENSON VARGHESE, a resident attorney in the State of New York and admitted to  
practice in this state and before this court, affirms the truth of the following to be true under  
penalties of perjury:

1. I am an associate with the firm of Wilson Elser Moskowitz Edelman & Dicker  
LLP attorneys for third-party defendants Certain Underwriters At Lloyd's London, (hereinafter  
"Third Party Defendant"), as such I am fully familiar with this action by virtue of my review of  
the files maintained by this office.

2. This affirmation is submitted pursuant to Rule 1.3 of the Local Rules of the  
United States Courts for the Southern and Eastern Districts of New York, in support of the

instant motion for the *pro hac vice* admission of George C. Rockas, Esq. to appear as counsel for the Third Party Defendant in the above-captioned action.

3. George C. Rockas is a partner with the law firm of Wilson Elser Moskowitz Edelman & Dicker LLP, 260 Franklin Street, Boston, Massachusetts 02110, telephone number 617-422-5301.

4. Mr. Rockas is licensed to practice and is an attorney in good standing in the Courts of the Commonwealth of Massachusetts. There are no pending disciplinary proceedings against Mr. Rockas in any State or Federal Court.

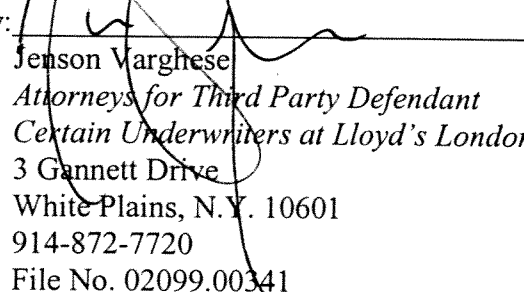
5. Annexed hereto as **Exhibit "A"** is an affirmation of George C. Rockas in support of the instant motion for admission *pro hac vice*. Annexed hereto as **Exhibit "B"** is a Certificate of Good Standing from the Commonwealth of Massachusetts confirming Mr. Rockas' good standing. Annexed hereto as **Exhibit "C"** is a proposed order for admission *pro hac vice*.

**WHEREFORE**, it is respectfully requested that this Court issue an order granting the *pro hac vice* admission of George C. Rockas, Esq. to the United States District Court, Southern District of New York to appear as counsel and advocate for the Third Party Defendant in this matter.

Dated: White Plains, New York  
February 24, 2012

Yours, etc.

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**

By:   
Jenson Varghese  
Attorneys for Third Party Defendant  
Certain Underwriters at Lloyd's London  
3 Gannett Drive  
White Plains, N.Y. 10601  
914-872-7720  
File No. 02099.00341

To: Finley T. Harckham, Esq.  
Vianny M. Pichardo, Esq.  
Anderson Kill & Olick, P.C.  
*Counsel for Defendant/Third Party Plaintiff*  
*Tutor Perini Corporation*  
1251 Avenue of the Americas  
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John D. Hughes, Esq.  
Joshua W. Gardner, Esq.  
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*Counsel for Plaintiffs*  
111 Huntington Avenue  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ILLINOIS NATIONAL INSURANCE COMPANY, THE  
INSURANCE COMPANY OF THE STATE OF  
PENNSYLVANIA, and NATIONAL UNION FIRE  
INSURANCE COMPANY OF PITTSBURGH, PA,

Plaintiffs,

- against -

TUTOR PERINI CORPORATION,

Defendant.

X

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TUTOR PERINI CORPORATION,

Third Party Plaintiff,

- against -

CERTAIN UNDERWRITERS AT LLOYD'S LONDON

Third Party Defendant.

-----X  
State of Massachusetts )

County of Suffolk )

George C. Rockas hereby affirms the following to be true under penalties of perjury:


1. I am a partner with the law firm of Wilson, Elser, Moskowitz, Edelman & Dicker LLP, 260 Franklin Street Boston, MA 02110-3112.
2. I submit this affirmation pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, in support of my motion for admission to practice *pro hac vice* to appear as counsel for Third Party Defendant Certain Underwriters at Lloyd's London in the above-captioned action.

3. I am in good standing of the bar of the state of Massachusetts and there are no pending disciplinary proceedings against me in any State or Federal court.
4. Wherefore, affirmant respectfully requests that he be permitted to appear as counsel and advocate *pro hac vice* in this matter.

Dated: February 24, 2012

Yours, etc.

**WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP**

By:   
George C. Rockas  
Attorneys for Third Party Defendant  
Certain Underwriters at Lloyd's  
London  
260 Franklin Street  
Boston, MA 02110-3112  
617-422-5301  
File No.



## EXHIBIT B

## COMMONWEALTH OF MASSACHUSETTS

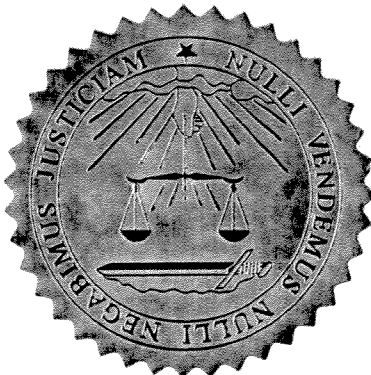
SUFFOLK, SS.

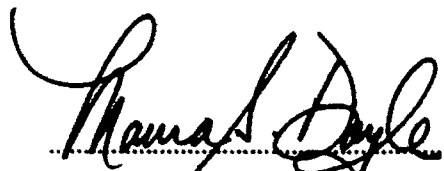
BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **eighteenth** day of **January** A.D. **1985**, said Court being the highest Court of Record in said Commonwealth:

George C. Rockas

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **twenty-fourth** day of **February** in the year of our Lord **two thousand and twelve**.



  
MAURA S. DOYLE, Clerk

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

## EXHIBIT C

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ILLINOIS NATIONAL INSURANCE COMPANY, THE Case No.: 11-CV-00431 (KBF)  
INSURANCE COMPANY OF THE STATE OF  
PENNSYLVANIA, and NATIONAL UNION FIRE  
INSURANCE COMPANY OF PITTSBURGH, PA,  
**ORDER FOR ADMISSION  
PRO HAC VICE**

Plaintiffs,

- against -

TUTOR PERINI CORPORATION,

Defendant. X

-----  
TUTOR PERINI CORPORATION,

Third Party Plaintiff,

- against -

CERTAIN UNDERWRITERS AT LLOYD'S LONDON

Third Party Defendant.

-----X  
The motion of George C. Rockas for admission to practice *pro hac vice* in the above captioned action is granted. The admitted attorney is permitted to argue or try this particular matter in whole or in part as counsel or advocate.

Applicant has declared that he is a member in good standing of the bar(s) of the state(s) of Massachusetts and that his contact information is as follows:

Applicant's Name: George Rockas

Firm Name: WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

Address: 260 Franklin Street

City / State / Zip: Boston, MA 02110-3112

Telephone / Fax: (p) 617-422-5301 / (f) 617-423-6917

Applicant having requested admission *pro hac vice* to appear for all purposes as counsel for Third Party Defendant Certain Underwriters at Lloyd's London in the above entitled action;

**IT IS HEREBY ORDERED** that Applicant is admitted to practice *pro hac vice* in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password.

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District / Magistrate Judge

